

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BROOKFIELD ASSET MANAGEMENT,
INC., f/k/a Hees International Bancorp Inc.,
and BRYSONS INTERNATIONAL, LTD.,
f/k/a Brysons International Bank, Ltd.,

Plaintiffs,

09 Civ. 8285 (PGG)

-against-

AIG FINANCIAL PRODUCTS CORP. and
AMERICAN INTERNATIONAL GROUP,
INC.,

Defendants.

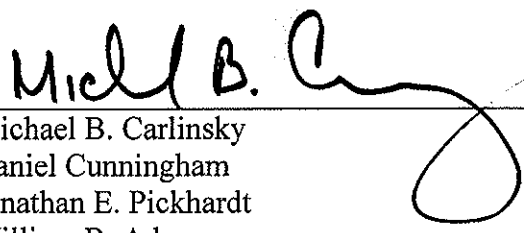
NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and supporting Declaration of Jonathan E. Pickhardt, dated December 17, 2009, Defendants AIG Financial Products Corp. and American International Group, Inc. hereby move this Court, before the Hon. Paul G. Gardephe, in Courtroom 18B at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for a judgment and order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Complaint filed by Plaintiffs Brookfield Asset Management, Inc. and Brysons International, Ltd., on the ground that Plaintiffs have failed to allege any causes of action against Defendants, and granting any such relief as this Court deems just and proper.

DATED: New York, New York
December 17, 2009

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

By:


Michael B. Carlinsky
Daniel Cunningham
Jonathan E. Pickhardt
William B. Adams
Simona Gory

51 Madison Avenue, 22nd Floor
New York, New York 10010-1601
(212) 849-7000
michaelcarlinsky@quinnemanuel.com
danielcunningham@quinnemanuel.com
jonpickhardt@quinnemanuel.com
williamadams@quinnemanuel.com
simonagory@quinnemanuel.com

*Attorneys for Defendants AIG Financial
Products Corp. and American International
Group, Inc.*